

**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD**

**LABOR PLUS, LLC, AND ITS SUCCESSOR  
WYNN LAS VEGAS, LLC**

**and**

**Case No. 28-CA-161779**

**LABOR PLUS, LLC**

**and**

**Case No. 28-CA-166890**

**WYNN LAS VEGAS, LLC**

**and**

**INTERNATIONAL ALLIANCE OF  
THEATRICAL STAGE EMPLOYEES  
AND MOVING PICTURE TECHNICIANS,  
ARTISTS AND ALLIED CRAFTS OF THE  
UNITED STATES AND CANADA  
LOCAL UNION 720 (IATSE)**

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**RESPONDENT WYNN LAS VEGAS, LLC'S CROSS-  
EXCEPTION TO THE ADMINISTRATIVE LAW JUDGE'S  
DECISION AND RECOMMENDED ORDER**

**KAMER ZUCKER ABBOTT**  
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Attorneys for Respondent  
Wynn Las Vegas, LLC

Pursuant to Section 102.46 of the Board's Rules and Regulations, Counsel for Respondent Wynn Las Vegas, LLC ("Wynn"), by and through its counsel of record, the law firm of Kamer Zucker Abbott, files this Cross-Exception to the Administrative Law Judge's Decision and Recommended Order, issued by Administrative Law Judge John T. Giannopoulos ("Judge") on February 16, 2017. Wynn takes exception to the following:

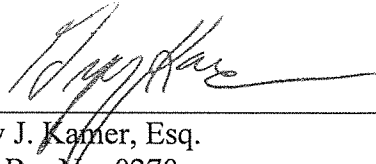
1. The Judge's failure to include as an alternative basis for dismissing the Complaint the fact that Wynn's due process rights have been violated.

DATED this 30<sup>th</sup> day of March, 2017.

Respectfully submitted,

KAMER ZUCKER ABBOTT

By:

  
\_\_\_\_\_  
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Wynn Las Vegas, LLC

**CERTIFICATE OF SERVICE**

I hereby certify that on March 30, 2017, I did serve a copy of **Respondent Wynn Las Vegas, LLC's Cross-Exception to the Administrative Law Judge's Decision** and

**Recommended Order upon:**

Larry A. "Tony" Smith, Esq.  
National Labor Relations Board, Region 28  
Resident Office  
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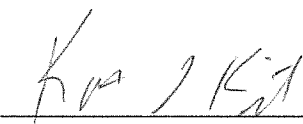
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An employee of Kamer Zucker Abbott